

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE: TRIQUANNA SHANTIA MANN,	{	CHAPTER 13
	{	
	{	
DEBTOR(S)	{	CASE NO. A18-60400-SMS
	{	
	{	JUDGE SIGLER

OBJECTION TO CONFIRMATION

COMES NOW MARY IDA TOWNSON, TRUSTEE herein, and objects to Confirmation of the plan for the following reasons:

1. The Debtor(s)' payments under the proposed plan are not current.
2. The Debtor(s) has failed to provide the Trustee with a copy of the federal tax return or transcript of such return for the most recent tax year ending immediately before the commencement of the instant case and for which a federal income tax return was filed, in violation of 11 U.S.C. Section 521(e)(2)(A)(i).
3. The amended Chapter 13 plan filed July 16, 2018 fails to indicate the proposed change(s) to Section(s) 4.3 at the top right of the form, possibly rendering those changes ineffective. General Order No. 21-2017.
4. Pursuant to information obtained at the meeting of creditors, it appears that the schedules fail to include total household income and expenses, thereby preventing the Chapter 13 Trustee from determining if all available income is being contributed to this repayment plan; specifically, the Debtor testified that her Lyft income is approximately \$561.00 per month.
5. The funding of post-petition lease installments have not been maintained in the above-styled Chapter 13 case; thereby rendering the present budget and proposed plan infeasible, 11 U.S.C. Section 1325 (a)(6).

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6. The proposed Chapter 13 plan appears to deviate from the local form plan adopted by the Northern District of Georgia, in violation of General Order No. 21-2017; specifically, Section 2.1.

7. The Chapter 13 Plan is not feasible as the sum of the equal monthly payments to creditors is greater than the monthly plan payment, in violation of 11 U.S.C. Section 1325(a)(6).

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny Confirmation of this Debtor's (s') Plan and to dismiss the case; or, in the alternative, convert the case to one under Chapter 7.

_____/s/_____
Albert C. Guthrie, Attorney
for Chapter 13 Trustee
GA Bar No. 142399

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CERTIFICATE OF SERVICE

This is to certify that I have this day served

DEBTOR(S):

TRIQUANNA SHANTIA MANN
3022 LINKS DRIVE, SE
ATLANTA, GA 30317

ATTORNEY FOR DEBTOR(S):

SLIPAKOFF & SLOMKA, PC
OVERLOOK III - SUITE 1700
2859 PACES FERRY RD, SE
ATLANTA, GA 30339

in the foregoing matter with a copy of this pleading by
depositing in the United States Mail a copy of same in a
properly addressed envelope with adequate postage thereon.

This 20th day of August 2018

/s/
Albert C. Guthrie, Attorney
for Chapter 13 Trustee
GA Bar No. 142399

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